

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**COALITION PLAINTIFFS' NOTICE OF FILING PROPOSED SCANNER  
REMEDY PURSUANT TO ORDER (DOC. 964)**

The Coalition Plaintiffs<sup>1</sup> respectfully submit the attached proposed injunctive relief order as directed by the Court (Doc. 964 at 141.) The proposed order delineates the specific measures or course of action the Coalition Plaintiffs request the Court to adopt at this time to address the injury raised in Plaintiffs' motion (Doc. 809), namely, the threatened voter disenfranchisement by operation of the optical scanners/tabulators in tandem with the BMD adjudication software. In addition, to explain how and to what extent the proposed relief will address the threatened injury, the Coalition Plaintiffs also attach the accompanying Declaration of Harri Hursti, with exhibits.

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<sup>1</sup> The "Coalition Plaintiffs" are Plaintiffs Coalition for Good Governance ("Coalition"), Laura Digges, William Digges III, Megan Missett, and Ricardo Davis.

Respectfully submitted this 26th day of October, 2020.

/s/ Bruce P. Brown

Bruce P. Brown  
Georgia Bar No. 064460  
BRUCE P. BROWN LAW LLC  
1123 Zonolite Rd. NE  
Suite 6  
Atlanta, Georgia 30306  
(404) 881-0700

/s/ Robert A. McGuire, III

Robert A. McGuire, III  
Admitted Pro Hac Vice  
(ECF No. 125)  
ROBERT MC GUIRE LAW FIRM  
113 Cherry St. #86685  
Seattle, Washington 98104-2205  
(253) 267-8530

*Counsel for Coalition for Good Governance*

/s/ Cary Ichter

Cary Ichter  
Georgia Bar No. 382515  
ICHTER DAVIS LLC  
3340 Peachtree Road NE  
Suite 1530  
Atlanta, Georgia 30326  
(404) 869-7600

*Counsel for William Digges III, Laura Digges,  
Ricardo Davis & Megan Missett*

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**CERTIFICATE OF COMPLIANCE**

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

*/s/ Bruce P. Brown*  
Bruce P. Brown

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 26, 2020, a copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

*/s/ Bruce P. Brown*  
Bruce P. Brown